

Docket no. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road, Unit 118
Riverdale, MD, 20373-1238

Greetings,

We thank NAIS for the opportunity to comment.

These remarks are prepared on behalf of Premier by Stan Potratz and Stephanie Sexton. Premier has, since Oct 2001, been the primary supplier of official APHIS visual plastic tags for the sheep industry's scrapie eradication effort. We have supplied 13 million custom-imprinted official tags to 50,000 sheep and goat premises in the USA. We have also been involved in the USAIP/NAIS development effort from mid-2003 onwards. In that time, Premier employees have visited Australia, New Zealand and Great Britain to learn what works and does not work in their countries for national animal tracking systems—visiting national ID officials, suppliers, and farms on which field trials of tracking systems are underway.

Having participated "up close and personal" in the rushed (by necessity) initial efforts of the official sheep scrapie ID plan with only 60,000 producers and 3 million animals to be tagged annually we are concerned that USDA and the livestock industries not make unnecessary mistakes—as 20 time the number of animals and producers are involved.

This concern is enhanced since so much attention has been given to NAIS recently by politicians and the agricultural media. Most appear to have minimal concept of the size of the task and therefore assume that it will be easy—just tag the animals and it's done. Given this naive national expectation it is vital that all possible efforts be taken to anticipate and avoid implementation problems.

Toward this end, we make the following suggested changes.

I. The draft plan is too sweeping and broad at this moment. As such it puts its own success at considerable risk. We encourage more attention be paid to the model of the Canadian and Australian cattle ID/tracking models. Like them we encourage selecting limited objectives that offer the most opportunity for success, least cost per animal, maximum benefit and least industry resistance. For the time being, we urge limiting the draft plan, its title and the accompanying standards to these. Do not expand the stated objectives until success and acceptance occurs.

Some specific ways to limit the objectives and ensure acceptance are:

A. Change the name (National Animal Identification System—NAIS). Words and inferences are important. First impressions are hard to change so it's important that they be accurate.

1. Using the word "Identification" in the name suggests that all we need to do is ID each animal with an official tag. This has been, is and will be counterproductive to the education and expectation component as much more is intended than simply tagging animals. Therefore we urge that the name be immediately changed to accurately describe the intent. NATS (National Animal Tracking System) would work.

2. Likewise "system" would be better changed to "systems". Why? Because "system" when attached to "animal" in the title infers that a single system is presently intended for and is expected to work for all major animal species in the USA. This is a very risky assumption until results from working field trials exist to suggest that this is possible. To our knowledge, the only country that has an RFID animal tracking system in place is Australia. Australia started with only a portion of their country several years ago and is only now expanding it. Canada is issuing RFID's for cattle but we were told in April 2005 at an NIAA annual meeting that very few automated readers are in place in Canada and functioning yet. The Australian system works only for cattle and appears to work well. However, Australian officials acknowledge that their cattle system does not work adequately for other species. Officials in New Zealand and Great Britain feel the same. Given the public attention to NAIS it is wiser to start small and be able to expand and build on initial success than to draft sweeping plans that disappoint, frustrate and unnecessarily invite resistance.

3. Using the same logic, the name should be limited still further. We understand cattle to be the "low hanging fruit" of the species for current RFID technology. They are high value animals with proven high retention of existing ISO RFID tags. Further, important domestic and export markets demand source-verified beef. Also, both national dairy and beef associations support mandatory ID/tracking. So a better name at this time would be "National Cattle Tracking System" (NCTS) instead of NAIS.

B. Change the standards and the draft plan to match the NCTS name. Both now read as if it is for all species. Indicate that systems will be implemented in the other major species as soon as practical and affordable systems that achieve 48 hour traceback goals are demonstrated adequately in field trials. It is usually wise to err on the side of caution when so many will be impacted by this proposed effort.

C. Reconsider the proposed AIN numbering and tag distribution system. Why?

1. To better ensure accuracy and validation. The proposed 15 digit AIN system does not include the premise number visually imprinted upon the tag. As such, the producer lacks a positive, visual way to absolutely know that the official tags he attaches to the ear are actually assigned to him in the national database unless he has 1.) a working reader, 2.) access to the national database, and 3.) time to access the database and use a reader. A significant % of users lack these abilities now and will for years to come (Amish, elderly, etc). We think it is vital that each user know that the tags installed in his animals are actually "his". So a better system would be to use the internal electronic number as described in the standards and to imprint on the outside of the tag the 7 digit premise number (which does not directly indicate premise location) plus an individual animal number (3-6 digits depending upon need).
2. To provide the producer with a more visually readable tag. To read a tag with the proposed 15 digit AIN number on it a producer would need to read and record all 12 digits (the 840 country code remains the same)—and do this from a small round tag in most instances. This is an impossible task. However if the numbering system imprinted on the tag were as noted in Point C1. above, a origin herd producer would need only to read & record the last 3-6 digits (most herds are small so 80% would need only 3 digits). We know that some claim that no one will read the tags visually anyway. We are not sure if this is a valid assumption. Certainly it is not true for species smaller than cattle. It may also not be true of calves moved into the marketplace that are less than a month old. And it won't be true for those cattle producers that are "technology-impaired".

3. To encourage producer participation by allowing the producer the option to purchase/install a matching visual management tag (that might be much larger and more readable from a distance) with the same individual number upon it as on the official tag. It would not have the USDA shield and need not have the 840 number. This allows the producer to use both tags for his management purposes (the official tag becomes a less readable backup for the management tag). And should the official tag be lost or prove to be unreadable electronically (it happens) the management tag would be a source of important data in a tracking crisis. Should the producer wish to hand imprint numbers and letters on the back-up management tag, space could be left for him to do so.
4. To reduce the number of official tags "in the system" but not yet in the producer's hands—since unused tags would not be stored in farm stores throughout the country. Less risk of misadventure.
5. To reduce the need by USDA to "police" so many official tag outlets. The number would drop from several thousand to less than 50.
6. To provide a secondary data source. If the tag is custom-imprinted with the premise number and an individual animal number as noted in point C1. above the database of the firm that imprinted the tag would become a backup to the national database. (This is exactly what occurs with the current scrapie visual tag system). It is very unlikely that it would ever be needed but it is nice to have this option available.
7. The primary negatives of this change is that producers would need to think ahead and order the official tags instead of picking them up at a local store. The US sheep producers adapted to this need with minimum problems as it is part of the mandatory scrapie ID plan.

II. Our response to the specific queries posed in the draft plan are:

We have worked with USDA's generic database for 4 years now vis a vis the scrapie ID efforts. It has steadily evolved and improved. On balance, we prefer that it be the national database instead of a private database. We think the firms and organizations proposing a private database certainly have the capability to develop this as they indicate. However, we are uncomfortable with knowledge of all the herds and animals in the country being in private "for-profit" hands. We are also uncomfortable with the private database charging a "tax" per tag to each producer. We appreciate that the proposed cost may be justified—but if the USDA does this work the cost will be spread out among all taxpayers instead of being borne solely by the nation's producers. This is a subsidy. The owners of the nation's flocks and herds would be unwise not to avail themselves of it as long as we can do so— as live animal prices are not likely to remain as high as they are at the present time.

III. For reasons noted previously we feel that it is vital that a system be established and become mandatory as soon as possible for the cattle industry—prior to 2009 if possible. It is also vital that this system work "out of the box". To ensure maximum probability of this we feel it is wise initially for NCTS (the better name for the present) limit themselves to the ISO technology that is proven to work for cattle in Australia—that is HDX 134.2 khz RFID tags and reading systems. We appreciate that patents on HDX technology mean relying upon one manufacturer (Texas Instruments). We feel USDA (who represent the largest cattle industry in the world) should approach this manufacturer and negotiate to allow low-cost access to transponders to more tag manufacturers.

